

# Exhibit A

1                         UNITED STATES DISTRICT COURT  
2                         NORTHERN DISTRICT OF CALIFORNIA  
3                         SAN FRANCISCO DIVISION  
4  
5                         WAYMO LLC,  
6                         Plaintiff,  
7  
8                         vs.                                                Case No. 17-cv-00939-WHA  
9                         UBER TECHNOLOGIES, INC.;  
10                         OTTOMOTTO, LLC; OTTO  
11                         TRUCKING LLC,  
12                         Defendants.  
13  
14                         HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY  
15                         VIDEO DEPOSITION OF TRAVIS KALANICK  
16                         San Francisco, California  
17                         Thursday, December 14, 2017  
18                         Volume III  
19  
20  
21                         REPORTED BY:  
22                         REBECCA L. ROMANO, RPR, CSR No. 12546  
23                         JOB NO. 2771242  
24  
25                         PAGES 504 - 668

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1 generally, was -- you know, we had a -- you know, a 12:45:18  
2 former AUSA, a former prosecutor in Joe Sullivan  
3 sort of overseeing -- you know, there are a lot of  
4 groups in his -- you know, in his domain, but that  
5 was one of them, and felt pretty confident that, 12:45:31  
6 you know, he sort of knew how to manage that kind  
7 of -- that kind of effort.

8 Q. Okay. At some point in time, you did --  
9 became aware of allegations that Ric Jacobs, now  
10 former Uber employee, made; is that -- is that 12:45:53  
11 right?

12 A. Yeah. There was an email that was --  
13 that, I think, he sent when he resigned, and I  
14 would -- I -- I received that email.

15 Q. Okay. What -- how did you react to that 12:46:02  
16 email when you saw it?

17 A. Well, look, I mean, it was a -- it was a  
18 serious email. So I took it seriously and  
19 forwarded it to Joe Sullivan, who runs security. I  
20 was obviously concerned; like, hey, is any of this 12:46:21  
21 true?

22 Q. Is that something that you asked him, or  
23 it's just you're -- that's just the reaction, which  
24 is what I --

25 A. Well, that's certainly -- 12:46:31

1 Q. (By Mr. Perlson) Okay. But counsel for 12:49:42  
2 Uber was present at the interview?  
3 A. I don't remember.  
4 Q. Okay.  
5 A. I don't remember anybody -- sorry. I 12:49:48  
6 don't remember any Uber internal counsel being  
7 there. There was Uber external counsel.  
8 Q. Right.  
9 A. Yeah.  
10 Q. Wilmer was the firm that Uber had 12:49:58  
11 retained, right?  
12 A. Correct. Yeah.  
13 Q. Af- -- subsequent to your email -- I'm  
14 sorry, not your email. Sorry.  
15 A. Yeah. 12:50:11  
16 Q. Subsequent to the email that Mr. Jacobs  
17 sent you in April, there was a -- he sent a demand  
18 letter to -- to Uber. Do you -- did -- in May.  
19 Did you see -- receive that?  
20 A. I did not. 12:50:19  
21 Q. Okay. And have you ever seen that?  
22 A. No.  
23 Q. Have you ever discussed the -- the  
24 contents of -- of that letter?  
25 A. At a very high level in prep for this 12:50:28

1 deposition. 12:50:31

2 Q. Okay. Had -- prior to your preparation

3 for this deposition, had anyone ever told you what

4 the contents of the allegation of the -- the May

5 demand letter were? 12:50:46

6 A. No.

7 Q. Did you know that it existed before your

8 prep for your deposition?

9 A. At -- at --

10 MS. DUNN: Objection to form. 12:50:56

11 THE DEPONENT: -- at some point I knew

12 that some kind of letter existed, but I didn't know

13 what it was.

14 Q. (By Mr. Perlson) Did you ever ask to see

15 it? 12:51:04

16 A. I don't remember if I asked to see it. I

17 know I never got to saw -- see it, and it may have

18 been because there was an independent

19 investigation. I -- I don't remember specifically

20 asking for it. 12:51:16

21 Q. Did you ever ask for the results of the

22 investigation into the allegations made by

23 Mr. Jacobs?

24 A. Yes.

25 Q. When was that? 12:51:30

1 I, Rebecca L. Romano, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

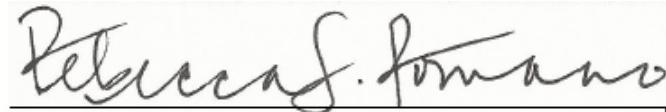
4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were administered an oath;  
8 that a record of the proceedings was made by me  
9 using machine shorthand which was thereafter  
transcribed under my direction; that the foregoing  
transcript is true record of the testimony given.

10 Further, that if the foregoing pertains to the  
11 original transcript of a deposition in a Federal  
12 Case, before completion of the proceedings, review  
13 of the transcript [ ] was [x] was not requested.

14 I further certify I am neither financially  
interested in the action nor a relative or employee  
15 of any attorney or any party to this action.

16 IN WITNESS WHEREOF, I have this date  
17 subscribed my name.

18  
19 Dated: December 15, 2017  
20  
21  
22

23   
24

25  
Rebecca L. Romano, RPR,  
CSR. No 12546